

1 DAVID L. YOHAI (*pro hac vice*)
2 ADAM C. HEMLOCK (*pro hac vice*)
3 DAVID E. YOLKUT (*pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
4 Telephone: (212) 310-8000
Facsimile: (212) 310-8007
5 E-mail: adam.hemlock@weil.com

6 BAMBO OBARO (267683)
WEIL, GOTSHAL & MANGES LLP
7 201 Redwood Shores Parkway
Redwood Shores, California 94065-1175
8 Telephone: (650) 802-3000
Facsimile: (650) 802-3100
9 E-mail: bambo.obaro@weil.com

10 JEFFREY L. KESSLER (*pro hac vice*)
EVA W. COLE (*pro hac vice*)
11 MOLLY M. DONOVAN (*pro hac vice*)
WINSTON & STRAWN LLP
12 200 Park Avenue
New York, New York 10166-4193
13 Telephone: (212) 294-6700
Facsimile: (212) 294-7400
14 E-mail: jkessler@winston.com

15 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and
MT Picture Display Co., Ltd.*

16
17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20
21 In re CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No. 3:07-cv-05944-SC

MDL No. 1917

22 This Document Relates to:

Individual Case No. 3:14-cv-02510

23 *ViewSonic Corporation v. Chunghwa
Picture Tubes, Ltd., et al.*, No. 3:14-cv-
02510

**DECLARATION OF ADAM C.
HEMLOCK IN SUPPORT OF THE
PANASONIC DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULE 79-5(d) AND 7-11**

1 I, Adam C. Hemlock, hereby declare as follows:

2 1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.
4 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of
5 New York and I am admitted to practice before this Court *pro hac vice*.

6 2. I submit this Declaration in support of the Panasonic Defendants’ Administrative Motion to
7 File Documents Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11. I have personal
8 knowledge of the facts stated herein and, if called as a witness, I could and would competently
9 testify thereto.

10 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt.
11 No. 306) (the “Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the Panasonic
13 Defendants seek to seal the following concurrently filed document: the highlighted portions of the
14 Panasonic Defendants’ Opposition to Plaintiff ViewSonic Corporation’s Motion for Leave to File
15 Surreply.

16 5. The highlighted portions of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic
17 Corporation’s Motion for Leave to File Surreply reference confidential information contained in the
18 OEM supply agreement previously sealed pursuant to the Order Granting the Panasonic Defendants’
19 Administrative Motion to File Under Seal, dated September 5, 2014 (Dkt. 2800). Specifically,
20 portions of pages 1, 2, 3, and 4 of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic
21 Corporation’s Motion for Leave to File Surreply contain such confidential information.

22 6. The Panasonic Defendants seek to submit the material referenced herein under seal in good
23 faith in order to comply with the Protective Order in this action and the applicable Local Rules.
24 Because the information in the materials that the Panasonic Defendants seek to submit under seal has
25 been designated as “Highly Confidential” by ViewSonic Corpration (the “Designating Party”), the
26 Panasonic Defendants are filing the accompanying Motion to File Under Seal, and will be prepared
27 to file an unredacted version of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic
28

1 Corporation's Motion for Leave to File Surreply in the public record "[i]f the Designating Party does
2 not file a responsive declaration as required by subsection 79-5(e)(1) and the Administrative Motion
3 to File Under Seal is denied." Civ. L.R. 79-5(e)(2).

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

6

7 Executed on October 16, 2014 at Tokyo, Japan.

8 By: /s/ Adam C. Hemlock
ADAM C. HEMLOCK

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28